

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:

**TOYS "R" US, INC., *et al.*,
Debtors,**

**Case No: 17-34665-KLP
Chapter 11
(Jointly Administered)**

* * * * *

**NOTICE OF APPEARANCE AND REQUEST
FOR NOTICES AND SERVICE OF PAPERS**

Please take notice that Whiteford, Taylor & Preston, LLP, and Paul Weiss Rifkind, Wharton & Garrison LLP hereby appear in this matter on behalf of the Ad Hoc Group of Taj Noteholders who are currently also noteholders under the DIP Note Indenture (the "Taj Noteholders") and requests, in accord with the notice requirements of 11 U.S.C. §§102(1) and 342, and Fed. R. Bankr. P. 2002, 3017, 3020, 4001 and 9007, that the undersigned be placed on any mailing matrix or service list that may be used for any purpose in this case and that all notices given or required to be given and all papers served or required to be served in this case be given to and served on the undersigned at the following address:

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Please take further notice that the foregoing request includes not only the notices and papers referred to in the rules specified above, but also, without limitation, orders and notices of any petition, pleading, complaint, hearing, application, motion, request or demand, whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, telegraph, telex, telecopy or otherwise which effect or seek to affect in any way any rights or interests of creditors and parties in interest.

This notice and demand is a “special appearance” and is not a consent to or waiver of the Association’s:

1. right under 28 U.S.C. § 157(c) to have final orders in proceedings reviewed de novo by a United States District Judge;
2. right to challenge the jurisdiction of the United States Bankruptcy Court, including, without limitation, its jurisdiction to adjudicate proceedings, whether by jury trial or otherwise, and notwithstanding the designation “core proceeding” under 28 U.S.C. § 157(b)(2);
3. right to a jury trial in any proceeding, whether available under state or federal law, notwithstanding the designation “core proceeding” under 28 U.S.C. § 157(b)(2);
4. right to have the reference withdrawn under 28 U.S.C. § 157(b)(2); and
5. all other rights, claims, actions, defenses, setoffs, recoupments or other matters to which the Taj Noteholders is entitled to by law, equity or agreement.

All those rights are expressly reserved without exception and without the purpose of confessing or conceding jurisdiction by the Taj Noteholders by this filing or by any other participation in the case by the Taj Noteholders. Unless otherwise expressly authorized, the

filings of this pleading does not authorize counsel to accept service of process on behalf of the Taj Noteholders.

Dated: September 20, 2017

Respectfully submitted,

/s/ Christopher A. Jones

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Counsel for Ad Hoc Group of Taj Noteholders

CERTIFICATE OF SERVICE

I hereby certify that on this September 20, 2017, the foregoing Notice of Appearance and Request for Notices and Service of Papers was filed and served via the Court's Electronic Case Filing System on all parties receiving such notification.

/s/ Christopher A. Jones
Counsel